

IN THE DISTRICT COURT FOR MIDDLE TENNESSEE AT NASHVILLE

ROBERT GORDON

v

CASE #

MATTHEW HORTON

AND

ERIN MISHKIN

RECEIVED

MAY 07 2025

US DISTRICT COURT
MID DIST TENN

COMPLAINT FOR DEFAMATION

PLAINTIFF, ROBERT C. GORDON, IS A CITIZEN ; RESIDENT OF TENNESSEE
AND HAS BEEN FOR MORE THAN SIX MONTHS PRIOR TO
FILING THIS COMPLAINT. THE ACTS COMPLAINED OF WERE
PUBLISHED ON THE INTERNET IN TENNESSEE AND AVAILABLE TO
THE PUBLIC.

ISSUES

THE DEFENDANTS HAVE PUBLISHED FALSE ; MALICIOUS STATEMENTS
TO THIRD PARTIES VIA COURT PLEADINGS. THE STATEMENTS
WERE MADE WITH RECKLESS DISREGARD FOR THE TRUTH
AND DEFAMING TO PLAINTIFF

SPECIFICALLY, ON APRIL 7th 2025 THE DEFENDANT FABRICATED
PHOTOS OF AN ALLEGED ASSAULT WHILE STATING "MS. MISHKIN
ENDURED BEING DRAGGED THROUGH HER HOME BY HER HAIR, BOWS
PUNCHED, KICKED, CHOKED, SMOTHERED, AND SEXUALLY ASSAULTED"

(EXHIBIT A)

(1)

ON MARCH 21, 2025 THE DEFENDANTS STATED, " PLAINTIFF
WAS PHYSICALLY VIOLENT WITH MS MISHKIN... ATTACKED ; THREATS
TO HER LIFE AND SAFETY... AND SEXUALLY ASSAULTED
(EXHIBIT B)

ADDITIONALLY, IN AN ATTEMPT TO SIDE STEP A SUBPOENA ;
CONCEAL THE FRAUD OF ERIN MISHKIN, THE DEFENDANTS
CONTACTED OVER 30 WITNESSES IN RECEIPT OF SUBPOENAS
DEMANDING INDIVIDUALS REFRAIN FROM COMPLYING WITH
COURT ORDERED SUBPOENAS. (EXHIBIT C)

FACTS

DEFENDANT, ERIN MISHKIN, WAS ARRESTED ON 10/8/22
FOR ASSAULTING PLAINTIFF, HITTING THE PLAINTIFF WITH
A CAR WHILE DRUNK WITH HER SMALL CHILD IN THE
CAR. ERIN MISHKIN SIGNED A PLEA DEAL ON 10/31/22
AND THE STATE WAS FORCED TO REMOVE HER CHILDREN
AFTER BEING CAUGHT BY A PRIVATE INVESTIGATOR DRINKING
BEER ON THE WAY TO SCHOOL ; FORCING HER CHILDREN TO
BLOW INTO THE " INTOX-ALOCK."

DURING HER PROBATIONARY PERIOD, ERIN MISHKIN FALSIFIED
GOVERNMENT RECORDS WHILE FORGING THE SIGNATURE OF
HONORABLE JUDGE TOM TAYLOR, WILLIAMSON COUNTY CLERK,

HAND HER FORMER COUNSEL, JONATHAN TURNER, WHO WAS FORCED TO WITHDRAW DUE TO THE FORGERY BY HIS CLIENT.

MISHKIN HAS FILED A LITANY OF RETALIATORY FALSE REPORTS TO INJURE & DEFAME THE PLAINTIFF AFTER HER ARREST.

MISHKIN WAS FORCED INTO ALCOHOL REHAB WHILE PREGNANT FOR EATING SANITIZER WHILE ATTEMPTING TO KILL HER UNBORN CHILD.

AS A DIAGNOSED PSYCHIATRIC PATIENT, MISHKIN HAS AN EXTENSIVE HISTORY OF CRIMINAL ACTIVITY INCLUDING FRAUDULENT USE OF FOOD STAMPS, A 2019 RAPE INCIDENT OF DAVID MISHKIN, IDENTITY THEFT OF A MINISTER, CRIMINAL IMPERSONATION OF A MINISTER FROM "HOLY TRINITY LUTHERAN CHURCH", MAIL FRAUD, TAX FRAUD, WIRE FRAUD, AND OF COURSE PERJURY.

DEFENDANT MATTHEW HORTON PUBLISHED FALSE, MISLEADING, AND MALICIOUS STATEMENTS ABOUT PLAINTIFF IN AN ATTEMPT TO CONCEAL FRAUD, ON-GOING FRAUD, BY HIS CLIENT. BY DOING SO MR HORTON IS FACILITATING TO THE FURTHERANCE OF A CRIME & FRAUD. EVIDENCED BY HIS LETTERS TO WITNESSES ATTEMPTING TO CIRCUMVENT THE RULES OF CIVIL PROCEDURE & THE POWER OF THE COURT.

REPUTATION & CHARACTER

PLAINTIFF IS A 40 YEAR OLD CORPORATE EXECUTIVE AT IBM LEAVING THE AMERICAS CONSULTING PRACTICE. HE HOLDS GRADUATE DEGREES FROM STANFORD, YALE, AND MIT, RECEIVED HIS UNDERGRADUATE DEGREE IN MASS COMMUNICATION GRADUATING MAGNA CUM LAUDE; EARNED HIS MBA FROM FORT HANS STATE UNIVERSITY.

PLAINTIFF HAS NO CRIMINAL HISTORY, NO TROUBLED PAST, AND WAS NAMED IBM'S CONSULTING PRACTICE EMPLOYEE OF THE YEAR IN 2022; BECAME PARTNER IN THE FIRM IN 2023. ADDITIONALLY, PLAINTIFF IS OWNER OF THE GORDON GORDON LLC CONSULTING; PRIVATE EQUITY FIRM.

ELEMENTS OF DEFAMATION

TO ESTABLISH A PRIMA FACIE CASE FOR DEFAMATION THE PLAINTIFF MUST PROVE (1) THE PARTY PUBLISHED A STATEMENT (2) WITH KNOWLEDGE THE STATEMENT WAS FALSE; DEFAMING TO THE OTHER OR (3) WITH RECKLESS DISREGARD FOR THE TRUTH OF THE STATEMENT OR WITH NEGLIGENCE IN FAILING TO ASCERTAIN THE TRUTH OF THE STATEMENT (SULLIVAN V. BAPTIST MEM'L HOSP, 995 SW 2d 569, 571 TENN 1999)

ELEMENTS APPLIED

(1) THE DEFENDANTS PUBLISHED STATEMENTS INTO THE PUBLIC BY WAY OF COURT PLEADINGS (2) THE DEFENDANTS KNEW STATEMENTS WERE FALSE { MADE TO DEFAME THE PLAINTIFF. DEFENDANTS ALLEGE MULTIPLE VIOLENT ACTS WITH NO PROOF { FABRICATED INJURIOUS PHOTOS ALL IN AN ATTEMPT TO CONCEAL ERIN MISHKINS FRAUD.

(3) THE DEFENDANTS MADE STATEMENTS WITH RECKLESS DISREGARD FOR THE TRUTH { NEGLECTED TO ASCERTAIN THE TRUTH SPECIFICALLY THE EGREGIOUS CLAIMS OF SEXUAL ASSAULT

THE NEWS LIES WITHIN THE KNOWLEDGE THEIR STATEMENTS WERE FALSE, DEFAMATIONS, AND PUBLISHED WITH RECKLESS DISREGARD FOR THE TRUTH, MEANWHILE, ATTEMPTING TO CONCEAL ERIN MISHKINS FRAUD { DIVERT ATTENTION FROM HER CRIMINAL ACTIONS

THE BASIS FOR AN ACTION FOR DEFAMATION IS THAT THE DEFAMATION HAS RESULTED IN AN INJURY TO THE PERSON'S CHARACTER { REPUTATION. THE DEFAMATORY STATEMENT MUST "CONSTITUTE A SERIOUS THREAT TO PLAINTIFF'S REPUTATION"

(STONES RIVER MOTORS INC V MID-SOUTH PUBL'G CO 651 S.W. 2d 713 TN APP 1983)

DAMAGES / INJURY

PLAINTIFFS PUBLIC REPUTATION IS INJURED BY THESE
ON-GOING CHARACTER ASSASSINATION ATTEMPTS AND FALSE
MALICIOUS STATEMENTS. THE DEFENDANTS HAVE NO EVIDENCE
TO SUPPORT THEIR CLAIM, BLATANTLY LIE, WERE NEGLIGENT
TO ASCERTAIN THE TRUTH. THEIR DILIGENT INDIFFERENCE
OR EVEN RECKLESS DISREGARD FOR THE TRUTH HAS RUINED
THE PLAINTIFFS DIGNITY CAUSING EMOTIONAL DISTRESS. IN ADDITION,
THESE FALSE ACCUSATIONS HAVE CAUSED GREAT DAMAGE TO
PLAINTIFFS BUSINESS / PROFESSIONAL CAREER. THUS, HINDERING
THE LIKELIHOOD FOR FURTHER ADVANCEMENT, PROMOTIONS, PAY
INCREASES. PLAINTIFFS STELLAR REPUTATION IS RUINED IN THE
COMMUNITY.

CONCLUSION

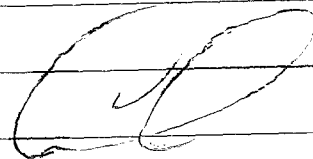
THE DEFENDANTS MEET ALL ELEMENTS OF DEFORMATION OF CHARACTER.
THE DEFENDANTS KNOWINGLY PUBLISHED FALSE STATEMENTS THAT
ARE DEFAMING TO THE PLAINTIFF. THE STATEMENTS WERE
MADE WITH RECKLESS DISREGARD FOR THE TRUTH. THEIR SOLE
PURPOSE WAS TO CONCEAL EVIL MISHAKING EVIL AND TO
HARASS, INTIMIDATE, EMBARRAS, AND SLANDER MR GORDON. THIS
RESULTED IN MR GORDON'S CHARACTER / REPUTATION HAVE BEEN
INJURED BY THESE FALSE ALLEGATIONS.

THE DEFENDANTS NOW HAVE THE BURDEN OF PROVING THE TRUTH
OF THEIR DEFAMATORY STATEMENTS.

RELIEF PRAYERS

- 1) PLAINTIFF BE AWARDED \$ 25, 000, 000. 00 USD
(TWENTY FIVE MILLION USD DOLLARS) IN DAMAGES
- 2) SANCTION IMPOSED ON MR HORTON ! REFERRED TO
DISCIPLINARY BOARD FOR PROFESSIONAL RESPONSIBILITY
- 3) PLAINTIFF AWARDED ALL COURT COST, FEES, ATTORNEY FEES,
DISCRETIONARY COST ! FEES
- 4) FOR ALL OTHER RELIEF DEEM PROPER.

RESPECTFULLY,



ROBERT C. GORDEN

VERIFICATION

STATE OF TENNESSEE

COUNTY OF DAVIDSON

COLE GORDON, AFTER FIRST BEING DULY SWORN, MAKES OATH THAT THE STATEMENTS CONTAINED IN HIS FORGONG "COMPLAINT" ARE TRUE TO THE BEST OF HIS KNOWLEDGE, INFORMATION, AND BELIEF AND THAT HE BRINGS THIS PETITION NOT OUT OF LEVITY OR BY COLLUSION WITH THE DEFENDANTS, BUT IN SINCERITY AND TRUTH, AND FOR THE CAUSES MENTIONED THEREIN

RG

ROBERT GORDON

SWORN & SUBSCRIBED BEFORE ME ON THIS 23 DAY OF October

Jerrie Payne

NOTARY PUBLIC

MY COMMISSION EXPIRES 2/14/2022



ROBERT C GORDON
408 CENTRAL ST
#65920
FRANKLIN, TN 37064



Nashville P&DC 372
MON 05 MAY 2025 PM

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MAY 07 2025
US DISTRICT COURT
MID DIST TENN

US DISTRICT COURT CLERK
719 CHURCH ST #1300
NASHVILLE, TN 37203

The state police have been an integral part of every major conviction. The Williamson County Sheriff's Office has neither requested nor expected this report. Therefore this department does not assume responsibility for the contents. Williamson County Sheriff's Office

This correspondence is from an inmate in a correctional institution. The Williamson County Sheriff's Office has neither requested nor inspected this report. Therefore this department does not assume responsibility for the contents. Williamson County Sheriff's Office

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